

EXHIBIT C

DEPOSITION OF ROBERTA SNIFFEN, 10/31/2014

1 Q. All right. Okay. We're still in
2 Exhibit 3, but if you would turn up to where it says
3 UF 106 in the bottom left-hand corner.

4 A. (Witness complies.) Yes.

5 Q. Do you recognize this form?

6 A. Yes.

7 Q. Okay. And I realize that this one is
8 filled out also, but what is this form?

9 A. This is a form we get with bills on it
10 sometimes.

11 Q. Okay.

12 A. Uh-huh.

13 Q. How many of these have you seen in your
14 career?

15 A. I couldn't even begin to speculate.

16 Q. A bunch?

17 A. A bunch.

18 Q. Okay. I think Sherri Wade said yesterday
19 that she's seen thousands of them.

20 A. I'm a little older than Sherri, so add a
21 couple years.

22 Q. Okay. So you've seen many thousands of
23 these forms?

24 A. I'm not that much older than she is.

25 Q. Fair enough. Fair enough. I won't

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1 speculate about how many then. Have you received
2 any training here at United Fire on how to use this
3 form?

4 A. Not to my recollection.

5 Q. Okay. And just so that we're clear what
6 this form is, this is a 1500 health insurance claim
7 form, is that correct?

8 A. That's what it's called.

9 Q. Okay. Is it also known as a HICF form?

10 A. It may be. I've never called it that.

11 Q. Okay. You've never called it a HICF form?

12 A. No.

13 Q. Okay. Now, have you ever -- Has anyone at
14 United Fire ever told you what the effect that box 12
15 has?

16 A. No.

17 Q. Okay. Would you mind reading what box 12
18 says?

19 A. Patient's or authorized person's signature.
20 I authorize the release of any medical or other
21 information necessary to process this claim. I also
22 request payment of government benefits either to
23 myself or to the party who accepts this assignment
24 below.

25 Q. Okay. And then do you see -- Does it have

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1 some of these other blanks -- if she had just pulled
2 the -- Well, scratch that. Did you explain to her
3 that if she filled out the "to" section there and
4 just put in Dr. Lanpher's office, that, you know,
5 that would only allow United Fire to pull medical
6 records from there?

7 A. I don't recall.

8 Q. Did you tell Debbie Plucker that
9 United Fire would reimburse her for the cost of
10 obtaining the medical records from Dr. Lanpher's
11 office?

12 A. I don't recall, but we certainly would
13 have.

14 Q. Well, is there any -- Are there any
15 written correspondence in the claims file
16 documenting, you know, whether you told her you had
17 or not?

18 A. I think I just wrote her a letter that
19 said, I had another idea if she didn't want to sign
20 the med auth -- Oh, here it is (indicating). 24.

21 Q. On 24.

22 A. Thank you for forwarding your signed
23 medical authorization. Unfortunately, it will not be
24 accepted by any medical facility with all the changes
25 made to the document. If you do not wish to complete

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1 medical authorization?

2 A. No, I did not.

3 Q. And would it surprise you that
4 Dr. Lanpher's office has since said they would have
5 accepted the auth on UF 114?

6 A. Yes, it would.

7 Q. And does this letter tell Debbie that
8 United Fire would pay for the costs of obtaining any
9 medical records she obtained from United Fire?

10 A. No, but I certainly left it open for her to
11 call me if she had any questions about anything.

12 Q. Well, do you wish you would have told her
13 that, you know -- Well, scratch that. Would it be
14 possible for you to -- for you to have modified
15 UF 110 so that you could only have obtained -- so
16 that Debbie could sign a med auth so that you could
17 only obtain medical records from Dr. Lanpher's
18 office?

19 A. (Witness complies.) Say that again.
20 I'm sorry.

21 Q. Was there a way for you to modify UF 110
22 at that time when you wrote this August 3rd letter
23 so that you could only obtain medical records from
24 Dr. Lanpher's office?

25 A. If she had just written in Dr. Lanpher here

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1 Q. Now, when you said that you told
2 Dr. Lanpher's office that the med auth was
3 unacceptable, is that what you have diaried here on
4 UF 9?

5 A. (Witness complies.) Yes. I told Mary,
6 was her name.

7 Q. And was that -- That's Mary Lanpher, right?

8 A. I don't know what her last name was.

9 Q. It was Mary at Dr. Lanpher's office?

10 A. Yes.

11 Q. Okay. So can you explain to me -- Take a
12 look at UF 8.

13 A. (Witness complies.)

14 Q. Could you explain to me that paragraph that
15 starts with, appears that Medicare has accepted our
16 notice?

17 A. When we mark a file as ORM, Medicare sends
18 something back that says it has been accepted for
19 ORM, so that means that we got her Social Security
20 number and her name right and everything.

21 Q. Okay.

22 A. Uh-huh.

23 Q. And what's this -- that last section,
24 Debbie either sends her bills in to us with the
25 records, or we wait for subro from Medicare and pay

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1 of the med auth when we sent it to the provider.

2 Q. Right. And the provider --

3 A. The provider that the insured gave us the
4 name of.

5 Q. Sure.

6 A. Uh-huh.

7 Q. And so if -- like let's take a look at this
8 case, because, you know, the -- I think we can agree
9 that, you know, the only provider that we -- that
10 United Fire was interested in getting medical records
11 from was Dr. Lanpher, right?

12 A. Once she presented to us whom her provider
13 was, yes.

14 Q. Well, when did you find out that
15 Dr. Lanpher was the provider?

16 A. I don't recall.

17 Q. Well, you got the HICF form on June 6th,
18 right?

19 A. We knew he was a provider, but she didn't
20 fill out the form, so we didn't know if it was her
21 only provider.

22 Q. Well, she eventually identified Dr. Lanpher
23 as the only provider. Do you remember that?

24 A. Eventually, but I couldn't tell you when,
25 so --